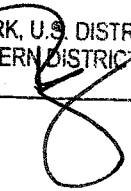


**SEALED****FILED**

OCT 14 2020

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISIONCLERK, U.S. DISTRICT CLERK  
WESTERN DISTRICT OF TEXAS  
BY  DEPUTY

UNITED STATES OF AMERICA,

§ CRIMINAL NO.SA:

Plaintiff,

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v.

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INDICTMENT

**SA 20 CR 0477****FB**

[In violation of:

18 U.S.C. §2252A(a)(2)

Receipt of Child Pornography;

18 U.S.C §2252A(a)(5)(B)

Possession of Child Pornography]

**THE GRAND JURY CHARGES:****COUNT ONE**

[18 U.S.C. § 2252A(a)(2)]

Between July 1, 2018 and April 1, 2019, within the Western District of Texas, and elsewhere,  
the Defendant,

**JONATHAN TRAVIS FLORA,**

did knowingly receive child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that had been shipped and transported in and affecting interstate and foreign commerce, by any means, including by computer,

All in violation of Title 18, United States Code, Section 2252A(a)(2).

**COUNT TWO**

[18 U.S.C. § 2252A(a)(5)(B)]

On or about June 17, 2020, within the Western District of Texas, the Defendant,

**JONATHAN TRAVIS FLORA,**

did knowingly possess material, specifically an Apple iPhone 7 model A1778 cellular phone, IMEI number 355329081833752, that contains an image of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that involved a prepubescent minor, that had been shipped and transported using any means and facility of interstate and foreign commerce, and that

was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce, including by computer,

All in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

**NOTICE OF UNITED STATES OF AMERICA'S DEMAND FOR FORFEITURE**  
**[See Fed. R. Crim. P. 32.2]**

**Sexual Exploitation of Children Violations and Forfeiture Statutes**

As a result of the foregoing criminal violations set forth above, the United States of America gives notice to Defendant, **JONATHAN TRAVIS FLORA**, of its intent to seek the forfeiture of certain property subject to forfeiture, including but not limited to the digital and electronic devices seized by law enforcement during the investigation of this case, upon conviction and pursuant to Fed. R. Crim. P. 32.2 and Title 18 U.S.C. §§ 2253(a)(1), (2), and (3), which states:

**Title 18 U.S.C. § 2253. Criminal forfeiture**


**(a) Property subject to criminal forfeiture.**-A person who is convicted of an offense under this chapter involving a visual depiction described in section 2251, 2251A, 2252, 2252A, or 2260 of this chapter or who is convicted of an offense under section 2251B of this chapter, or who is convicted of an offense under chapter 109A, shall forfeit to the United States such person's interest in-

**(1)** any visual depiction described in section 2251, 2251A, 2252, 2252A, or 2260 of this chapter, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of this chapter;

**(2)** any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and

(3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

A TRUE BILL.

  
FOREPERSON OF THE GRAND JURY

GREGG N. SOFER  
UNITED STATES ATTORNEY

BY:

  
TRACY THOMPSON

Assistant United States Attorney

*for*